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Attorneys for Defendants

ETHICÓN, INC. and JOHNSON & JOHNSON

UNITED STATES DISTRICT COURT EASTERN DISTRICT OF CALIFORNIA

| CHERI SHELTON, | Case No. 2:21-cv-00423-TLN-AC |
|--------------------------------------|---|
| Plaintiff, |)) JOINT NOTICE OF SETTLEMENT) AND REQUEST FOR STAY |
| v. | |
| JOHNSON & JOHNSON and ETHICON, INC., |))) |
| Defendants. |)) |

TO THE HONORABLE COURT, AND TO ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

Plaintiff, Cheri Shelton, and Defendants Ethicon, Inc. and Johnson & Johnson (collectively, the "Parties"), by and through their undersigned counsel, notify the Court that a settlement in principle has been reached. It will likely take 120 days before the settlement of the case will be finalized. As a result, the parties jointly request that the case be moved to inactive status and/or that all deadlines and other requirements be stayed, until such time as the settlement can be concluded and the case can be dismissed with prejudice.

| | | Case 2:21-cv-00423-TLN-AC | Document 17 Filed 01/28/22 Page 2 of 3 |
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| | 2 | DATED: January 28, 2022 | BARON & BUDD, P.C. |
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| | 4 | | By: /s/ David B. Fernandes |
| | 5 | | David B. Fernandes Attorneys for Plaintiff |
| | 6 | | CHERI SHELTON |
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| | 9 | DATED: January 28, 2022 | TUCKER ELLIS LLP |
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| so ♦ St | 11 | | By: /s/ <i>Joshua J. Wes</i> Joshua J. Wes |
| rancis | 12 | | Attorneys for Defendants |
| <u>.P</u> ▶ San F | 13 | | JOHNSON & JOHNSON and |
| IS LI | 14 | | ETHICON, INC. |
| ELI Los A | 15 | C1 | IGNATURE ATTESTATION |
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| TUCKER ELLIS LLP 1 ◆ Columbus ◆ Los Angeles ◆ S | | | ories listed, and on whose behalf this filing is submitted, |
| TUCKER eveland ◆ Columbus ◆ I | 16 17 | I attest that all other signate | ories listed, and on whose behalf this filing is submitted, |
| $\frac{\overline{TUCKER}}{\text{go} \bullet \text{Cleveland} \bullet \overline{\text{Columbus} \bullet}}$ | 16 17 18 | I attest that all other signate concur in the filing's content and | ories listed, and on whose behalf this filing is submitted, |
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TUCKER ELLIS LLP

CERTIFICATE OF SERVICE

I declare that I am a citizen of the United States and a resident of Los Angeles, California or employed in the County of Los Angeles, State of California. I am over the age of 18 and not a party to the within action. My business address is Tucker Ellis LLP, 515 South Flower Street, Forty-Second Floor, Los Angeles, California 90071-2223.

On January 28, 2022, I served the following: JOINT NOTICE OF SETTLEMENT AND REQUEST FOR STAY on the interested parties in this action by:

- (X) **ELECTRONICALLY VIA ECF:** the above-entitled document to be served electronically through the United States District Court, Eastern District ECF website, addressed to all parties appearing on the Court's ECF service list. A copy of the "Filing Receipt" page will be maintained with the original document in our office.
- (X) I declare that I am employed in the office of a member of the bar of this Court at whose direction the service was made. I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed on January 28, 2022, at Los Angeles, California

/s/ Joshua J. Wes Joshua J. Wes